

# EXHIBIT 7



Benjamin W. Hulse  
Direct Dial: 612-343-3256  
E-Mail: [bhulse@blackwellburke.com](mailto:bhulse@blackwellburke.com)

December 7, 2018

Via E-mail  
([gassaad@kennedyhodges.com](mailto:gassaad@kennedyhodges.com))

Gabriel Assaad  
Kennedy Hodges, LLP  
711 W. Alabama Street  
Houston, TX 77006

Re: *In re Bair Hugger Forced Air Warming Products Liability Litigation*  
MDL No. 15-2666-JNE-DTS  
*Partlow v. 3M Company – Court File No. 16-cv-02144*

Dear Gabe:

As you note in your email last Friday, our production does not include communications between Defendants' sales representatives and Dale Medical Center concerning the safety and effectiveness of the Bair Hugger system. We have not found any. We have reviewed the email of Chris Howell, the sales representative for Dale Medical in 2011, and found no communications with Dale Medical about the Bair Hugger system.

We also reviewed the email of Mr. Howell's supervisor, Stefanie Grace, and likewise found no such communications. Both individuals left 3M in 2014, and as we have informed you, are now employees of Cincinnati SubZero represented by CSZ's counsel.

Over the last several days, we have reviewed the email of Chris Hartley, the sales rep responsible for Dale before Mr. Howell. Mr. Hartley is also a former employee who left 3M in June 2011. Our review of Mr. Hartley's email found no communications between Mr. Hartley with Dale about the safety and effectiveness of the Bair Hugger system. While we do not believe it is relevant to the litigation, we are producing an internal email to Mr. Hartley about Dale Medical which may possibly relate to Bair Hugger pricing terms. We produce this document merely to show you that Mr. Hartley was handling the Dale Medical account at the time.

As a further step, we reviewed the email of several other sales personnel from before the date of the surgery and likewise found no communications about the safety and effectiveness of the Bair Hugger system. We have also searched for communications with Dale Medical about the safety

Gabriel Assaad  
December 7, 2018  
Page 2

and effectiveness of the Bair Hugger system in our entire review database from general causation discovery. Again, we found no such communications.

Of course, when Bair Hugger warming units were delivered to Dale Medical in 2008, they would have included the operator's manual, service manual, and instructions for use then in effect.

Our supplemental production today also includes additional device history information about the Model 505s identified in 3M's warming unit installation report.

Sincerely,



Benjamin W. Hulse  
BWH:ck